

**IN THE UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA
Plaintiff

Crim. No. 07-75

Vs.

RUBEN OTERO LOPEZ
Defendant

MOTION FOR EARLY RELEASE FROM PROBATION

TO THE HONORABLE COURT:

Comes now Defendant RUBEN OTERO LOPEZ, through counsel and respectfully states and prays:

- 1. On January 29 2008 Petitioner was sentenced in the instant case to serve a probation term of three years.**
- 2. Petitioner has complied with all the conditions imposed upon him at the time he was sentenced and has conducted himself as a model citizen.**
- 3. Because of his conviction, Petitioner, who is a doctor specialized in internal medicine, has been unable to secure a job in his line of training.**
- 4. Petitioner was born in the city of New York where he resided during 25 years. Petitioner is convinced that he will be able to secure a job as a Medical Doctor in New York City. People related to the medical profession have informed Petitioner that once he is discharged from probation, he will be able to obtain his medical license which is a requisite for obtaining a job.**
- 5. Petitioner has served 27 months of his 36 months probation sentence. During that time he has observed and excellent conduct. His Probation Officer can attest to that.**
- 6. Petitioner honestly believes that he is completely rehabilitated and has no further need of supervision. He has been greatly helped by the**

supervision and assistance he has received from the USPO. However the resources that at the present time are used for his benefit can be dedicated to other individuals that are in more need to be helped than him.

7. Petitioner hereby prays from the Court under 18 U.S.C. §3564 (c) to order the early termination of his term of probation and discharge him from probation.

WHEREFORE Petitioner Ruben Otero Lopez respectfully prays from the Court to grant the present motion and issue an order granting him early termination of his term of probation and his discharge from it.

Respectfully submitted in San Juan, P. R. this November 30. 2010.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: To A.U.S.A. José Ruiz and the defense Attorneys of record in the case.

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